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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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APR 4 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Revision of Part 22 of the)
Commission's Rules Governing)
the Public Mobile Services)

CG Docket No. 92-115

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MOTION TO ACCEPT LATE-FILED PLEADING

C-Two-Plus Technology, Inc. ("C2+") respectfully requests that the Commission accept for filing the attached "Comments on Joint Reply," which were due yesterday. As set forth below, acceptance of the C2+ comments will not prejudice any party in this proceeding.

On February 2, 1995, the Mobile and Personal Communications Division of the Telecommunications Industry Association ("TIA") and the Cellular Telecommunications Industry Association ("CTIA") jointly filed proposed modifications to Section 22.919 of the Commission's rules. TIA also requested an additional thirty days to submit further proposed rule modifications based on ongoing discussions between TIA and CTIA. By Order, DA 95-402 (rel. Mar. 7, 1995), the Commercial Radio Division of the Wireless Telecommunications Bureau granted TIA's request for extension of time and gave C2+ and other interested parties until April 3, 1995 to comment on any rule modifications proposed by TIA and CTIA.


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C2+ prepared its comments and served them by mail yesterday on TIA and CTIA. However, due to a copier malfunction, the C2+ comments did not arrive at the Commission until 5:31 p.m., and the messenger was turned away at the guard's desk. Under these circumstances -- and because no party will be prejudiced by acceptance of the C2+ comments one day late -- C2+ respectfully requests that the attached "Comments on Joint Reply" be accepted for filing and made a part of the record in this proceeding.

April 4, 1995

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing
"Motion to Accept Late-Filing Pleading" was served this 4th
day of April, 1995 by first-class mail, postage prepaid, upon
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Timothy J. Fitzgibbon

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April 3, 1995

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COMMENTS ON JOINT REPLY

C-Two-Plus Technology, Inc. ("C2+") submits these comments in response to the "Joint Reply and Comments" submitted by the Mobile Personal Communications Division of the Telecommunications Industry Association ("TIA") and the Cellular Telecommunications Industry Association ("CTIA") on February 2, 1995 ("TIA/CTIA Joint Reply").¹ Adoption of the rule modifications proposed by TIA/CTIA would resolve the dispute between those parties over the adoption and implementation of new rule Section 22.919 at the expense of their competitors and cellular consumers.

¹ In response to a request for extension of time filed by TIA, the Commercial Radio Division of the Wireless Telecommunications Bureau extended the time for filing TIA's reply in this proceeding until March 2, 1995 to allow TIA and CTIA to conclude their ongoing negotiations and to afford them an opportunity to propose further rule modifications in addition to those attached to the TIA/CTIA Joint Reply. See Order, DA 95-402 (rel. Mar. 2, 1995). The same Order afforded C2+ and other interested parties until April 3, 1995 to comment on the rule modifications proposed by TIA/CTIA. Apparently, TIA/CTIA have proposed no further modifications since filing their Joint Reply.

Preliminary Statement and Summary

Competitive considerations are "an important element of the 'public interest' standard which governs federal agency decisions." United States v. F.C.C., 652 F.2d 72, 82 (D.C. Cir. 1980), quoting Northern Natural Gas Co. v. F.P.C., 399 F.2d 953, 961 (D.C. Cir. 1968). Consequently, the Commission is obligated to "make findings related to the pertinent anti-trust policies, draw conclusions from the findings and weigh those conclusions with other important public interest considerations." United States v. F.C.C., 652 F.2d at 82.

Competitive considerations are particularly important with respect to cellular services because "the cellular duopoly market structure" is not "fully competitive." Bundling of Cellular Customer Premises Equipment and Cellular Service, 7 FCC Rcd. 4028 (1992), at ¶11." Existing services and new services which "have the potential to compete with cellular" do not "currently constrain facilities-based cellular carriers from acting anticompetitively." Id. Even though "neither cellular carrier in a geographic market may possess market power by itself, antitrust law and economics recognize that there is a substantial likelihood that duopolists will collude (explicitly or implicitly) to charge supracompetitive prices." W.G. Lavey, Inconsistencies in Applications of Economics at the Federal Communications

Commission, 45 Fed. Comm. L.J. 437, 477-78 (1993).² Consequently, in this case, the Commission has an obligation to ensure that the anti-fraud measures proposed by the carriers do not provide a smokescreen for anticompetitive conduct.

C2+ respectfully suggests that the rule modifications proposed by TIA/CTIA will have little or no effect on the problem of cellular fraud. However, by establishing that carriers have the exclusive right to authorize the use of cellular phones with altered ESNs (Report and Order, 9 FCC Rcd. 6513 (1994) ("Report and Order"), at ¶60) -- and that phones with altered ESNs will be permitted to operate on the system only if the ESN alteration was done by a manufacturer -- TIA and CTIA effectively would eliminate any competition offered by C2+: (a) to the manufacturers in the repair and upgrade of mobile units; and (b) to the carriers in the provision of cellular extension phone services. As such, the TIA/CTIA proposal represents a lucrative resolution of the

² For example, economists in the Commission's Office of Plans and Policy estimated that the price reductions which would result from the creation "a competing third cellular system in the Los Angeles area would increase welfare by almost \$800 million." Id. at 478, citing Evan R. Kwerel & John R. Williams, "Changing Channels: Voluntary Reallocation of UHF Television Spectrum" (FCC OPP Working Paper No. 27) 4 (1992). Parties in this proceeding have estimated that the C2+ extension service would result in substantially greater savings to consumers based on estimates of consumer demand for cellular extension service and the recurring monthly fees currently charged by carriers offering their own versions of extension service. See e.g. C2+ Reply to Comments of McCaw Cellular Communications, Inc., filed Feb. 2, 1995 at 9 and Appendix 1.

dispute between those two industry trade associations and their members -- at the expense of their competitors and consumers.

Instead of prohibiting all ESN transfers outside the manufacturer's factory, or further reducing competition in the provision of cellular services by adopting the TIA/CTIA proposal, the Commission should revisit its erroneous conclusion that "any alteration of the ESN renders it useless" in performing its primary function, i.e. to enable "the carriers to bill properly for calls made from the telephone." Report and Order at ¶54. In reaching that conclusion, the Commission failed to distinguish between instances in which: (a) third parties program a cellular customer's ESN into another cellular phone without the customer's consent so that calls from that phone will be billed fraudulently to the unsuspecting customer;³ and (b) the customer requests that the ESN of his primary phone be programmed into another cellular phone so that he or she can use the second phone to make and receive calls which will be billed properly to the customer's existing account. In the latter case, ESN transfers promote customer convenience while ensuring that all calls made from the second

³ This practice is known as "cloning" fraud. Another type of cellular fraud, known as "tumbling," occurs when an invalid ESN is programmed into a cellular phone in order to complete a call from that phone before the cellular system's verification process can discover that the ESN is invalid.

phone are properly billed with the full knowledge and consent of the customer.

There are at least two principal examples of ESN transfers which promote proper billing and provide convenience and highly desired services to consumers. First, "procedures presently utilized by virtually every cellular telephone manufacturer call for authorized repair agents to transfer ESNs from defective or old equipment to new equipment if they are incapable of repairing the subscriber unit quickly." TIA Petition for Clarification and Reconsideration, filed Dec. 19, 1994 ("TIA Reconsideration Petition") at ¶11. This practice has been widely accepted by manufacturers, carriers and consumers.⁴ C2+ and other non-manufacturers also use ESN transfer methods in performing repair and upgrade services.

Second, by programming a second cellular phone owned by a cellular subscriber to emit the ESN of the subscriber's primary phone, C2+ provides the subscriber with the convenience of making calls from an "extension" phone while ensuring that those calls will be billed properly to the customer's account. For example, using the C2+ service, a

⁴ For example, in its Reply Comments filed on November 5, 1992, Motorola Inc. ("Motorola") stated that it had an ESN transfer "program in place" for repairs and upgrades. The program "has been positively accepted by a number of cellular service providers, as well as by the cellular user public," and even "the equipment certification program currently operated by CTIA permits these ESN transfer procedures." Motorola Reply Comments at 2-3. Ericsson has described a similar ESN transfer program. Reply Comments of Ericsson Corporation, filed Nov. 5, 1992, at 3-4.

subscriber with a car-mounted phone can use a portable while away from his car to make calls which will be billed to his existing cellular account. There is an enormous demand for this type of service, and C2+ offers a cost-effective means to meet that demand.⁵

The rule modifications proposed by TIA/CTIA would prohibit operation of any phone with an ESN that has been altered by anyone other than a manufacturer. Thus, customers would be prohibited from using phones whose ESNs have been transferred during repairs and service upgrades performed by any entity other than the manufacturer. As a result, the manufacturers would be the only entities available to provide repair and upgrade services to subscribers. Likewise, the TIA/CTIA proposal would prohibit use of C2+ extension phones, ensuring that carriers would be the sole source for customers desiring the convenience of cellular extension services. There simply is no basis for so restricting competition for these services -- which clearly do not involve fraudulent use of cellular equipment.

⁵ Most cellular carriers do not offer "extension" or "two phones/one number" service and instead require customers desiring to use two phones to subscribe to two accounts -- with two monthly recurring service fees. The larger carriers that do offer "two phones/one number" or similar "extension" services typically charge an additional recurring monthly service fee of between \$17 and \$40 (plus airtime) for the service. See Cellular One "FlexPhone" and BellSouth "2 Phones/1 Number" service descriptions attached as Exhibit 1.

I. ESN Transfers During Repairs And Service Upgrades Should Be Permitted And Not Reserved Exclusively To The Manufacturers.

The Commission concluded in the Report and Order at ¶62 that "cellular phones with altered ESNs do not comply with the cellular system compatibility specification and thus may not be considered authorized equipment under the original type acceptance." In reaching this conclusion, the Commission did not distinguish between ESN alteration performed by manufacturers during repairs and service upgrades and ESN alteration performed by C2+ for the purpose of providing cellular extension service. Nevertheless, while the Commission "advise[d] all cellular business licensees and subscribers that the use of the C2+ altered cellular telephone constitutes a violation of the Act and our rules," it made no mention of the countless phones currently operating with altered ESNs resulting from repair procedures used by the manufacturers and others. C2+ respectfully submits that there is no reasonable basis for: (a) prohibiting ESN transfers during repairs and service upgrades performed by responsible parties other than manufacturers; and (b) furthering the double standard established by the Commission in the Report and Order and by adopting the rule modification proposed by TIA/CTIA.

A. ESN Emulation Does Not Violate
The Cellular System Compatibility
Specification.

The Commission's conclusion that "cellular telephones with altered ESNs do not comply with the cellular system compatibility specification" is inconsistent with the express language of that specification. The Compatibility Specification does not prohibit all alteration of the ESN. It states only that the ESN:

must be factory-set and not readily alterable in the field. The circuitry that provides the serial number must be isolated from fraudulent contact and tampering. Attempts to change the serial number circuitry should render the mobile station inoperative.

Cellular Communications Systems, 86 FCC 2d 469, 593 (1981) (Compatibility Specification, §2.3.2) (emphasis added). ESN changes which are not "readily" performed in the field and which do not "change the serial number circuitry" do not violate the Compatibility Specification.

In contrast to the Compatibility Specification, new rule Section 22.919(c) prohibits all ESN manipulation on phones initially type-accepted after January 1, 1995, regardless of whether such manipulation affects the circuitry. If prior rule Section 22.915, which incorporated the Compatibility Specification, had prohibited ESN modifications which do not affect the circuitry, there would have been no need for the rule change now embodied in Section 22.919(c).

In addition, manufacturers such as Ericsson have stated that they use encrypted methods to transfer ESNs during their repair procedures specifically in order to protect against unauthorized use of those procedures. See Ericsson Reply Comments, filed Nov. 5, 1992 at 3-4. C2+ uses similar encryption techniques to ensure that its ESN emulation process cannot be used by unauthorized parties to "readily alter" ESNs in the field without the encryption codes controlled exclusively by C2+. Thus, contrary to the Commission's conclusion, ESN transfers performed at the request of a cellular customer in order to facilitate repairs and service upgrades -- and using encryption technology to protect against unauthorized use -- neither violate the Compatibility Specification nor undermine industry efforts to combat cellular fraud.

B. The Commission Has Established A Double Standard For Repairs And Service Upgrades Using ESN Transfers.

The Commission issued a Public Notice in 1991 stating that "attempts to change the serial number circuitry" violate the Compatibility Specification and that "any individual or company operating such phones or performing such alterations is in violation of Section 22.915 of the Commission's rules." See Public Notice, Report No. CL-92-3, Mimeo No. 20011, rel. Oct. 2, 1991. In November 1992, Motorola and Ericsson submitted reply comments in this proceeding describing the ESN transfers used in their repair and service

upgrade procedures. Thus, the Commission has known since at least 1992 about the ESN transfer procedures used by Motorola, Ericsson and others during repairs and service upgrades, but never previously claimed that those repaired and/or upgraded phones violated the Compatibility Specification.

Likewise, following a meeting between CTIA and the Mobile Services Division in October 1992 and other ex parte contacts by CTIA in November 1992, the Commission on January 15, 1993 issued a letter to CTIA stating for the first time that "it is a violation of Section 22.915 of the Commission's Rules for an individual or company to alter or copy the ESN of a cellular telephone so that the telephone emulates the ESN of any other cellular telephone," regardless of whether the ESN circuitry has been affected. See C2+ Reply to CTIA Opposition to Petition for Reconsideration at 4-7 and Exhibit B to Appendix 1. Although the Commission was well aware at the time of the ESN transfer procedures used by the manufacturers for repairs and service upgrades, the Mobile Services Division's letter -- like the Commission's Report and Order -- makes no mention of those procedures and instead singles out only those phones with ESNs transferred by C2+ as being in violation of the Commission's Rules.

Even after release of the Mobile Services Division's January 15, 1993 letter, manufacturers continued to use ESN transfer procedures similar to those employed by C2+ in their repairs and service upgrades. See Motorola's "Cellular Sub-

scriber Technical Training Manual" dated July 1993 at 6-7, 6-9, a copy of which was attached as Exhibit 1 to the Petition for Reconsideration of MTC Communications, filed Dec. 19, 1994. In fact, in its Petition for Clarification and Reconsideration filed December 19, 1994, TIA stated that "procedures presently utilized by virtually every cellular telephone manufacturer call for authorized repair agents to transfer ESNs from defective or old equipment to new equipment if they are incapable of repairing a subscriber unit quickly." TIA Reconsideration Petition at ¶11.

Thus, despite the fact that there are countless Motorola, Ericsson and other manufacturers' phones in operation which "transmit an ESN other than the one originally installed by the manufacturer" as a result of the manufacturer's repair and service upgrade procedures, only C2+ has been singled out by the Commission as "violating the Act and our rules." Report and Order at ¶62. There simply is no basis for this double standard and no reason to prohibit C2+ and other responsible parties from competing with the manufacturers to provide repair and upgrade services.

C. The TIA/CTIA Proposal Continues The Commission's Double Standard By Ratifying Prior ESN Transfers Performed By Manufacturers And Prohibiting Use Of All Other Phones Using Altered ESNs.

TIA/CTIA contend that their proposed rule Section 22.919(e) simply "makes explicit what was previously stated

only in paragraph 62 of the Report and Order adopting §22.919: that the operation of a cellular mobile telephone incorporating an ESN other than that set by the manufacturer in compliance with the Rule is prohibited." TIA/CTIA Joint Reply at ¶13. However, the Report and Order indicated that use of a cellular phone which transmits "an ESN other than the one originally installed by the manufacturer" would violate the Commission's rules. Report and Order at ¶62. TIA/CTIA neglect to mention that by omitting the underlined word from the Report and Order, their proposed rule modification would permit continued use of any phone in which the manufacturer previously changed the ESN, but would prohibit use of all other phones in which ESNs were changed by non-manufacturers during repairs and/or service upgrades.

In short, the TIA/CTIA proposal would absolve the manufacturers of all liability for previous ESN transfers despite the Commission's conclusion that those transfers violated the Compatibility Specification. At the same time, cellular subscribers who had the same repair and/or upgrade services provided by independent service providers would be prohibited from continuing to use their phones on the system. There is no reasonable justification for such disparate treatment.

II. Prohibiting C2+ Extension Service Will
Adversely Affect Consumers And Will Contribute
Nothing To Fraud Prevention.

By prohibiting the use of any phone with "an ESN other than that programmed into the unit by its manufacturer," the rule modifications proposed by TIA/CTIA would prohibit the use of C2+ extension phones. Such prohibition will eliminate competition to the carriers in providing highly desired extension services, unnecessarily increasing rates to consumers, and providing no additional protection whatsoever against cellular fraud.

A. The C2+ Extension Service Does Not Violate
The Compatibility Specification.

As set forth supra at 8, the Compatibility Specification does not prohibit ESN transfers which do not change the ESN circuitry and cannot be "readily" performed in the field. Like the transfer procedures used in the manufacturers' repair and service upgrades, the ESN emulation procedures used by C2+ to provide "extension" phone service do not affect the ESN circuitry. See C2+ Petition for Reconsideration at 19-21 and Exhibit 1, ¶3. In addition, C2+ uses an encrypted process to emulate the ESN of the subscriber's primary phone in order to provide that subscriber with extension phone service. Id. at 9-11. Despite the fact that there are far simpler ESN transfer procedures readily available, C2+ uses sophisticated encryption technology to maintain the security of its emula-

tion process and to ensure that the process cannot be used by unauthorized parties to "readily alter" ESNs in the field without the encryption codes controlled by C2+.⁶ Thus, there is no reason to conclude that the actual procedure used by C2+ to emulate the ESN of the subscriber's primary phone violates the Compatibility Specification because the circuitry is not affected and ESNs cannot be "readily altered" in the field without the proper codes.

However, the Compatibility Specification also states that the ESN "uniquely identifies a mobile station to any cellular system," and the carriers have argued that the C2+ service violates this "uniqueness requirement." See McCaw Comments on Petitions for Reconsideration and Clarification, filed Jan. 20, 1995 at 6.⁷ The Commission and TIA have

⁶ Ericsson indicated that it employed a similar encryption process to accomplish its ESN transfers during repairs and service upgrades. Ericsson Reply Comments, filed Nov. 5, 1992 at 3-4. Contrary to the Commission's characterization of those comments (Report and Order at n.104), Ericsson supported use of an encrypted method for all ESN transfer procedures. The authentication procedures advocated by TIA/CTIA rely on encryption technology not unlike that used by C2+. See TIA Reconsideration Petition at ¶¶20-21.

⁷ Although the carriers apparently interpret the Compatibility Specification to require that every mobile unit have a different ESN, that interpretation clearly is not mandated by the language of the Specification. In fact, CTIA found the language so "ambiguous" that it requested the Commission to clarify "that any particular ESN will not exist in more than one mobile unit." CTIA Comments filed Oct. 5, 1992 at 8. The Commission did not respond to the CTIA request and stated only that with respect to mobile transmitters initially type-accepted after January 1, 1995, "each mobile transmitter in service must have a unique ESN." See Section 22.919(a).

recognized that "cellular telephone systems use ESNs to identify units for call-billing purposes." TIA Reconsideration Petition at 3; Report and Order at ¶54. Thus, the mobile unit must be properly identified to the system in order "to assure accurate call-billing." Id. C2+ respectfully submits that where a bona fide cellular customer uses a second phone which is programmed to emit the ESN of his primary phone, the second phone is "uniquely identified" to the system "to assure accurate call-billing," thereby complying with the language and intent of the Compatibility Specification.

In particular, where the subscriber uses only one cellular phone at a time, the mobile unit being used clearly complies with the requirement that it be uniquely identified to the system. Carriers offering "extension" or "two phones/one number" services instruct their subscribers not to use more than one phone at a time. For example, Cellular One advises its "FlexPhone" customers that they must "decide which phone to receive calls on and simply turn the others 'OFF'" because the "FlexPhone feature will not function properly if both phones are 'ON'." See FlexPhone materials attached as Exhibit 1 hereto. Likewise, BellSouth advises its "2 Phones/1 Number" customers that "only one phone can be turned on at any time" because if both phones are left on, you may not be able to answer your incoming calls." See "2 Phones/1 Number" materials also attached as Exhibit 1. Like the carriers, C2+ advises its extension phone customers that they should use

only one phone at a time. Consequently, each time the C2+ subscriber uses his extension phone, he will be uniquely identified to the system, and calls will be billed properly to his primary phone.⁸

III. The Commission Must Weigh The Effects Of
Diminished Competition Resulting From Its New
Rule Against The Likelihood That The Rule Will
Reduce Cellular Fraud.

Finally, the Commission must balance the potential benefits to the public resulting from any increase in fraud protection against the detriment to the public resulting from the elimination of competition in cellular repair, upgrade and "extension" services. C2+ suggests that TIA was correct when it stated that the new rules would be "prohibitively expensive" for consumers and would "never be successful" in combatting cellular fraud. TIA Reconsideration Petition at iii-iv, 17. In short, prohibiting the services offered by C2+ to bona fide cellular subscribers will do nothing to discourage those engaged in true cellular fraud and instead

⁸ Carriers also have claimed that simultaneous use of both phones by a C2+ customer adversely affects system "integrity." See McCaw Comments on Petitions for Reconsideration and Clarification, filed Jan. 20, 1995 at 6-11. However, no carrier has explained why it assumes that C2+ customers will operate both phones simultaneously, but the carriers' customers will only operate one at a time. Likewise the carriers do not explain why system "integrity" is adversely affected when a C2+ customer is unable to answer incoming calls because both of his phones are on, but not when a carrier's customer is unable to answer incoming calls for the same reason.

will only increase the cost of desired services to legitimate subscribers.

The Commission's anti-fraud measures are predicated on an attempt to prevent ESN-altering software from falling into the wrong hands. See, e.g. Report and Order at ¶61 (prohibiting ESN transfers in authorized service centers because "computer software to change ESNs...might become available to unauthorized persons through privately operated computer 'bulletin boards'."). However, the record clearly confirms that the software already is widely available. Thus, rather than trying to put the software genie back in the bottle, the Commission should focus its anti-fraud efforts on identifying the parties involved in the "extension" business, ensuring that they provide service only to legitimate cellular subscribers, and enabling carriers to identify fraudulent users and terminate service to those users as quickly as possible.

C2+ respectfully suggests that the Commission should require any cellular customer desiring to use an emulated phone to register with the carrier and to provide specifics regarding the emulated phone (to check against theft) and the party that performed the emulation for the subscriber. Such a requirement would enable the carriers to compile a database not only of authorized users of extension phones, but also of the entities involved in ESN emulation and/or transfer. Working with those entities, the carriers could more easily

identify situations in which a customer's ESN has been stolen and is being used without his authorization -- and could get to the root of the real cellular fraud problem.

CONCLUSION

Adoption of the rule modifications jointly proposed by TIA and CTIA will eliminate competition in the repair and upgrade of cellular mobile units and in the provision of cellular "extension" services. It will likely drive companies like C2+, which provides services desired and used by legitimate cellular subscribers, out of business while those engaged in true cellular fraud continue to operate unabated. Instead of prohibiting the services offered by C2+, the Commission should require cellular customers using those services to register and to identify the phone involved and the parties who performed the ESN transfer for the customer. If the carriers know who the legitimate users are, they can more easily terminate service to fraudulent users.

April 3, 1995

Respectfully submitted,



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Attorneys for
C-Two-Plus Technology, Inc.

Exhibit 1

Set Yourself Free With FlexPhone: The Flexible Choice in Cellular Service

FlexPhone is a new service from Cellular One that lets you direct calls on your cellular number to any one of up to 3 cellular phones. FlexPhone is not an extension phone nor will it allow two people to use the same number. Designed to make staying in touch easier, FlexPhone is ideal for someone already enjoying the hands-free convenience of an installed car phone, but would like a portable to use outside the car. The following information will help you decide if FlexPhone service is right for you:

How Does FlexPhone Work?

Once you have decided whether one or two additional phones will compliment your lifestyle, call Cellular One or an Authorized Dealer to initiate FlexPhone. After activation, you decide which phone to receive calls on and simply turn the others "OFF". When a caller dials your number, the phone that is "ON" will ring. The FlexPhone feature will not function properly if both phones are "ON". Now, your calls can follow you from car, to meetings, on errands or nearly anywhere else.

What About Roaming?

When you start your FlexPhone service, you'll designate the phone you plan to use outside the Baltimore-Washington coverage area as "Primary" and the other(s) as "Secondary". That's it—your cellular service is ready to travel with you on your "Primary" phone. You cannot use your "Secondary" phones to roam unless you first redesignate your FlexPhone service with Customer Care. (There's no charge for redesignation. May take up to 48 hours to complete.)

Can Two Phones Sharing One Number Call Each Other?

No, since only one phone will operate at a time, you can't use FlexPhone to call between phones sharing the same number. To accomodate this, you would need to use the full value of two Cellular One phone numbers.

Two Ways to Start Enjoying FlexPhone

FlexPhone service is available for Cellular One customers that want to operate two or three cellular phones with the same cellular number. The following FlexPhone pricing is effective for customers using any Cellular One rate plans in addition to their current rate plan monthly fee:

- **Two Phone Service**

Add one extra phone to your Cellular One number for \$17.95 per month.

- **Three Phone Service**

Add two extra phones to your Cellular One number for \$29.95 per month.

(Additional fees for activation of second and/or third phones are not required. Up to 48 hours may be required for FlexPhone activation. Regular air-time charges and applicable sales taxes apply. All calls are billed to one number on the same bill. Detailed billing will not distinguish which phone made a call.)

Ask Your Cellular One Representative for Details

To learn more about FlexPhone or about our commitment to providing the best products, service and value available, ask your local Cellular One dealer or call *611 (free from your cellular phone) or 1-800-CELL-ONE.